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Attorneys for Defendant TRUMP RUFFIN

TOWER I, LLC, erroneously sued herein as

TRUMP RUFFIN COMMERCIAL, LLC, d/b/a

TRUMP INTERNATIONAL LAS VEGAS and

TRUMP INTERNATIONAL HOTEL &

TOWER LAS VEGAS; and TRUMP

INTERNATIONAL HOTELS MANAGEMENT,

LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA, SOUTHERN DIVISION

SEBASTIAN SYMEONIDES, an  
Individual,

Plaintiff,

vs.

TRUMP RUFFIN COMMERCIAL, LLC, a  
Foreign Limited-Liability Company d/b/a  
TRUMP INTERNATIONAL LAS VEGAS  
and TRUMP INTERNATIONAL HOTEL &  
TOWER LAS VEGAS; TRUMP RUFFIN  
TOWER I, LLC, a Foreign Limited-Liability  
Company; TRUMP INTERNATIONAL  
HOTELS MANAGEMENT, LLC, a Foreign  
Limited-Liability Company; OTIS  
ELEVATOR CORPORATION, a Foreign  
Corporation; DOES I through X, inclusive;  
and ROE BUSINESS ENTITIES I through  
XX, inclusive,

Defendants.

Case No. 2:23-cv-00854-JAD-MDC

**STIPULATION TO EXCEED THE 10  
DEPOSITION LIMIT PURSUANT TO  
RULE 30(a)(2)(A)**

COMES NOW, Plaintiff SEBASTIAN SYMEONIDES, by and through his attorneys

1 of record, the law firm CHRISTIANSEN TRIAL LAWYERS, Defendant TRUMP RUFFIN  
 2 TOWER I, LLC, erroneously sued herein as TRUMP RUFFIN COMMERCIAL, LLC, d/b/a  
 3 TRUMP INTERNATIONAL LAS VEGAS and TRUMP INTERNATIONAL HOTEL &  
 4 TOWER LAS VEGAS; and TRUMP INTERNATIONAL HOTELS MANAGEMENT, LLC by  
 5 and through its counsel of record, the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP  
 6 and Defendant OTIS ELEVATOR COMPANY by and through its counsel of record, the law  
 7 firm ROGERS, MASTRANGELO, CARVALHO, AND MITCHELL and TUCKER ELLIS LLP,  
 8 and hereby agree that the limit of ten (10) depositions per side, set forth by Fed. R. Civ. P.  
 9 30(a)(2)(A), will be exceeded by Defendants and by Plaintiffs as stipulated herein.

10 This matter involves allegations of personal injury by Plaintiff SEBASTIAN  
 11 SYMEONIDES as a result of an alleged elevator incident on February 14, 2022. Due to  
 12 the degree of alleged damages, as well as the complexity of the damages and the alleged  
 13 incident, the parties agree that the ten (10) deposition limit per side will prevent the parties  
 14 from adequately preparing their cases for trial in this matter. This matter involves numerous  
 15 fact witnesses, including numerous medical and expert witnesses, which will need to be  
 16 deposed to adequately resolve this matter on the merits.

17 Therefore, the parties hereby stipulate to exceed ten (10) depositions per Fed. R.  
 18 Civ. P 30(a)(2)(A), subject to the following:

- 19 1. Nothing in the parties' stipulation or any associated Order shall be construed so  
 20 as to modify the Fed. R. Civ. P. 30(d)(1) limitations as to deposition duration  
 21 ("[u]nless otherwise stipulated or ordered by the court, a deposition is limited to  
 22 1 day of 7 hours"); nor shall this stipulation be construed so as to deprive any  
 23 party of that party's right to seek Court relief from the Rule 30(d) deposition  
 24 duration limitations pursuant to that subsection.
- 25 2. Nothing in the parties' stipulation or any associated Order shall be construed so  
 26 as to prejudice or preclude the right of any parties hereto from seeking Court  
 27 relief, including but not limited to any protective orders, pursuant to any  
 28 applicable provisions of the Federal Rules of Civil Procedure - including but not

1 limited to Fed. R. Civ. P. 26(c), 30(d), 30(g).

2 Dated this 7th day of May, 2024

Dated this 7th day of May, 2024

3 CHRISTIANSEN TRIAL LAWYERS

LEWIS BRISBOIS BISGAARD &  
SMITH LLP

4  
5 /s/ R. Todd Terry

/s/ Josh Cole Aicklen

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*& Tower Las Vegas and Trump*  
*International Hotels Management, LLC*

11 Dated this 7th day of May, 2024

12 ROGERS, MASTRANGELO, CARVALHO  
13 & MITCHELL

14  
15 /s/ Rebecca L. Mastrangelo

16 REBECCA L. MASTRANGELO, ESQ.  
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18 *Attorneys for Defendant Otis Elevator*  
*Company*

19 Dated this \_\_\_\_ day of May, 2024

20 TUCKER ELLIS LLP

21 /s/ Vasudhsiri T. Sathienmars

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27 *Attorneys for Defendant Otis Elevator*  
28 *Company*

IT IS SO ORDERED

  
/s/  
United States Magistrate Judge

DATED: 5-9-24